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March 18, 2004

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Re: **Application Serial No.:** 09/811,718
Appellants: Jay Paul Drummond, et al.
Filing Date: March 19, 2001
Confirmation No.: 2928
Title: Method And System For Connecting Services To
An Automated Transaction Machine
Docket No.: D-1120 R2

Sir:

Please find enclosed a Supplemental Brief of Appellant pursuant to 37 C.F.R. § 1.192 in triplicate for filing in the above-referenced application. The Supplemental Brief is submitted in response to the Notification of Non-Compliance With 37 C.F.R. § 1.192 mailed February 20, 2004.

It is believed that no fee is due upon the submission of this Supplemental Brief. However, if any fee is in fact due, please charge such fee to the Deposit Account No. 09-0428 of InterBold.

Very truly yours,

Ralph E. Jocke
Reg. No. 31,029

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Appellants have taken this appeal from the Office Action dated January 13, 2003.

In the Action:

claims 44-102 were rejected under 35 U.S.C. § 112, second paragraph as being

indefinite for failing to particularly point out and distinctly claim the subject

matter which Appellant regards as the invention; and

claims 25 and 44-119 were rejected under 35 U.S.C. § 103(a) as being

unpatentable over Zeanah, et al. (U.S. Patent No. 5,993,816) ("Zeanah") in view

of Gutman, et al. (U.S. Patent No. 5,221,838) ("Gutman").

Appellants respectfully traverse these rejections and submit that all of their claims patentably distinguish over the cited art and all particularly point out and distinctly claim the subject matter which Appellants regard as the invention.

REAL PARTY IN INTEREST

Diebold, Incorporated, an Ohio corporation having its principal location at 5995 Mayfair Road, North Canton, Ohio 44720 is the Assignee of all right and title to the claimed invention. Diebold has been in business since 1859. It is a publicly traded company with 2003 revenues of \$2.1 billion.

RELATED APPEALS AND INTERFERENCES

It is believed that there are no related appeals or interferences.

STATUS OF CLAIMS

Claims 25 and 44-119 are pending in the Application. Claims 25 and 44-96 were twice rejected.

Claims 44-102 were rejected under 35 U.S.C. § 112 second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Appellant regards as the invention.

Claims 25 and 44-119 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zeanah in view of Gutman.

Copies of all the pending claims are included in the attached Appendix.

STATUS OF AMENDMENTS

No amendments were requested to be admitted after final action.

SUMMARY OF INVENTION

This invention relates to Automated Teller Machines ("ATMs"). An exemplary embodiment of the present invention is directed to a host ATM (540, 584) which includes at least one processor, at least one wireless network port (550) and at least one transaction function device such as a cash dispenser (541) (Figures 13 and 18; Page 34, line 8 to page 35, line 10; and Page 37, line 1 to page 39, line 6). In this described exemplary embodiment the cash dispenser is operative to dispense cash from the host ATM responsive to communication with at least one portable personal ATM (582) through the at least one wireless network port. Examples of

portable personal ATMs include PDAs (548), notebook computers (544), cell phones (542), and pagers (546).

An exemplary embodiment operates in accordance with a method that includes connecting a transaction service (602) in the host ATM. The transaction service includes at least one transaction function device of the ATM, such as a cash dispenser. The host ATM also includes a lookup service (600). The exemplary method includes registering the transaction service with the lookup service, which includes storing a copy of a service proxy in association with the lookup service. In accordance with the exemplary method, a copy of the service proxy is acquired from the lookup service by the portable personal ATM through the wireless network port on the host ATM. The personal ATM invokes a method of the service proxy in response to at least one input provided through an input device of the personal ATM. The at least one transaction function device of the transaction service of the host ATM (such as a cash dispenser), operates responsive to the invoked method of the service proxy to carry out an ATM transaction function (such as dispensing cash from the host ATM).

ISSUES PRESENTED FOR REVIEW

The issues in this appeal are whether:

- 1) Claims 44-102 are indefinite pursuant to 35 U.S.C. § 112, second paragraph for failing to particularly point out and distinctly claim the subject matter which Appellants regard as the invention.

- 2) Zeanah in view of Gutman teaches or suggests every limitation and relationship in claims 25 and 44-119 so as to render these claims obvious pursuant to 35 U.S.C. § 103(a).

GROUPING OF CLAIMS

Each of claims 25 and 44-119 stands or falls independently, as each separately recites features and relationships which are not disclosed or suggested in Zeanah in view of Gutman. Hence each of claims 25 and 44-119 individually constitutes a separate group.

ARGUMENT

In the Action from which this appeal has been taken: claims 44-102 were rejected under 35 U.S.C. § 112, second paragraph; and claims 25 and 44-119 were rejected pursuant to 35 U.S.C. § 103(a) with respect to Zeanah in view of Gutman. Appellants respectfully submit that these rejections are improper because: each pending claim particularly points out and distinctly claims the subject matter which Appellants regard as the invention; and each pending claim specifically recites features and relationships that are neither disclosed nor suggested by the cited references.

The Zeanah Reference

Zeanah is directed to a delivery system (12) (Figure 1) which provides financial services to a plurality of remote devices. The remote devices include personal computers (18), notebook computers (20), screen phones (14), and ATMs (16). The delivery system includes a plurality of reusable global components (Figure 12) which interact with each other to deliver information to

the remote devices. The components include a transaction executor component which performs transactions at the delivery system. The components also include a presentation manager component for formatting outputs to the remote devices.

The Gutman Reference

Gutman is directed to an electronic wallet (100) which is capable of wireless or wired communication with a central financial institution (bank) computer (Column 8, lines 59-60). An example of a transaction that may be performed with the electronic wallet includes a "cash transaction." A cash transaction as defined in Gutman corresponds to the electronic wallet 502 (Figure 5A) communicating with a financial institution 500 to modify an amount in an account balance such as by transferring cash from one account balance to another account balance or initiating a transaction to transfer cash from a borrowing account balance to a cash account balance (Column 13, lines 10-18; Column 14, lines 34-37). Although Gutman discloses communication with a central financial institution, nowhere in Gutman is it disclosed or suggested that the electronic wallet communicates with an ATM with transaction function devices, such as a cash dispenser.

35 U.S.C. § 112, Second Paragraph

In the Action claims 44-102 were rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Appellants regard as the invention. Appellants respectfully traverse this rejection.

It was asserted in the Action that it is unclear from the claims how the host ATM is responsive to communication with at least one portable ATM through the at least one wireless network. The Action further asks the question: "Does the host ATM respond to a code, or some other means?"

With respect to claims 44-73, Appellants respectfully traverse this rejection on the grounds that the phrase recited in claim 44: "wherein the cash dispenser is operative to dispense cash from the host ATM responsive to communication with at least one portable personal ATM through the at least one wireless network port" is sufficiently definite for purposes of defining the metes and bounds of Appellants' invention.

With respect to claims 74-102, Appellants respectfully traverse this rejection on the grounds that the step recited in claim 74 of: "dispensing cash from the host ATM responsive to receipt of the at least one communication" is also sufficiently definite for purposes of defining the metes and bounds of Appellants' invention.

For example, the Specification at page 13, lines 13-21 states that if a user wishes to dispense cash, the personal ATM can be placed in operative connection with a JINI™ enabled host ATM that includes a cash dispenser service. The personal ATM communicates with the host ATM to discover and join with the host ATM, and uses a proxy to the cash dispenser service to cause cash to be dispensed from the host ATM. The personal ATM may be operative to prompt the user to select an account from which to receive the money and the amount desired. **The information associated with the selected account and the amount desired are sent to the cash dispenser service with method calls of the cash dispenser proxy. After validating the account information, the cash dispenser will dispense the cash and have the selected**

account debited. In this described exemplary embodiment Sun Microsystems JINI™ or other plug and play systems may be used to define the low level protocols used to configure transaction services on an ATM network and to allow services to communicate with object method calls and events (Page 10, lines 3-7).

The Specification at page 43 lines 1-21 and Figure 22, further discloses the process for withdrawing cash from a host ATM using a personal ATM to communicate account information and a withdrawal amount to the host ATM. Examples of personal ATMs which may be capable of communicating with a host ATM 540 for purposes of causing the dispensing of cash from the cash dispenser 541 of the host ATM are shown in Figure 13 (Page 34, lines 8-16). The personal ATMs may include cell phones 542, notebooks 544, pagers 546, and PDAs 548 for example. The host ATM 540 may include one or more external network ports 550 that allow the personal ATMs to operatively connect with the host ATM. In addition the Specification discloses that the communication may be submitted through connections to the host ATM by a wireless connection such as with an IR or RF interface (Page 51, lines 20-22).

For this described exemplary embodiment, the Specification explains that "The information associated with the selected account and the amount desired are sent to the cash dispenser service with method calls" and this supports the recited feature of "communication" in claims 44 and 74. Also for this described exemplary embodiment, the Specification explains that "After validating the account information, the cash dispenser will dispense the cash" and this supports the feature recited in claim 44 of "the cash dispenser is operative to dispense cash from the host ATM responsive to communication" and corresponds to the step recited in claim 74 of:

"dispensing cash from the host ATM responsive to receipt of the at least one communication" as recited in claim 74.

Appellants respectfully submit that the recited language of: "dispense cash from the host ATM responsive to communication" in claim 44 and "dispensing cash from the host ATM responsive to receipt of the at least one communication" in claim 74, particularly point out and distinctly claim subject matter which Appellants regard as being a part of the invention. It is submitted that these recitations in claims 44 and 74 are supported by the Specification and are clear and precise regarding what is claimed. For the foregoing reasons it is respectfully submitted that the rejections pursuant to 35 U.S.C. § 112, second paragraph presented against claims 44-102 are improper and should be withdrawn.

The Applicable Legal Standard
For Obviousness Pursuant to 35 U.S.C. § 103

Before a claim may be rejected on the basis of obviousness pursuant to 35 U.S.C. § 103, the Patent Office bears the burden of establishing that all the recited features of the claim are known in the prior art. This is known as *prima facie* obviousness. To establish *prima facie* obviousness, it must be shown that all the elements and relationships recited in the claim are known in the prior art. If the Office does not produce a *prima facie* case, then the Appellants are under no obligation to submit evidence of nonobviousness. MPEP § 2142.

The teaching, suggestion, or motivation to combine the features in prior art references must be clearly and particularly identified in such prior art to support a rejection on the basis of obviousness. It is not sufficient to offer a broad range of sources and make conclusory statements. *In re Dembiczak*, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

Even if all of the features recited in the claim are known in the prior art, it is still not proper to reject a claim on the basis of obviousness unless there is a specific teaching, suggestion, or motivation in the prior art to produce the claimed combination. *Panduit Corp. v. Denison Mfg. Co.*, 810 F.2d 1561, 1568, 1 USPQ2d 1593 (Fed. Cir. 1987). *In re Newell*, 891 F.2d 899, 901, 902, 13 USPQ2d 1248, 1250 (Fed. Cir. 1989).

The evidence of record must teach or suggest the recited features. An assertion of basic knowledge and common sense not based on any evidence in the record lacks substantial evidence support. *In re Zurko*, 258 F.3d 1379, 59 USPQ2d 1693 (Fed. Cir. 2001).

It is respectfully submitted that the Action does not meet these burdens.

Claims 25, 44-119 Are Not Obvious Over Zeanah In View Of Gutman

In the Action claims 25, 44-119 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zeanah in view of Gutman. These rejections are respectfully traversed. Appellants' response to these rejections is based on the Office's referenced interpretations of Zeanah and Gutman. Thus, any change in the Office's interpretation of these references shall constitute a new ground of rejection.

Appellants traverse these rejections on the grounds that Appellants' claims recite features and relationships which are neither disclosed nor suggested in the prior art, and because there is no teaching, suggestion or motivation cited so as to produce Appellants' invention. The features recited in Appellants' claims patentably distinguish over the applied references.

Claim 25

Claim 25 is an independent claim which is directed to a method. Claim 25 recites that the method comprises: "(a) connecting a transaction service in a host automated transaction machine, wherein the transaction service includes at least one transaction function device, and wherein the host automated transaction machine includes a lookup service." It is respectfully submitted that neither Zeanah nor Gutman discloses or suggests connecting a transaction service in a host automated transaction machine, where the transaction service includes a transaction function device and the host automated transaction machine includes a lookup service.

The Action acknowledges that Zeanah fails to show services such as a printer service, card reader service, and a cash dispenser service, but asserts that Gutman discloses a printer for printing checks, a card reader for reading, and a means for making cash transactions. The Action

asserts that it would have been obvious for an artisan of ordinary skill at the time of the invention of Zeanah to integrate/substitute the Gutman system (electronic wallet) into the system of Zeanah (personal computer-18 and/or PDA-20). The Action asserts that this would be because an artisan of ordinary skill at the time of the invention of Zeanah would have recognized the convenience in the combination of features provided by the Gutman invention, inasmuch as each of the notoriously old and well-known features provided by Gutman would have been sought after in making conventional automated electronic and/or cash transactions. The Action further asserts that to integrate/substitute the Gutman system into Zeanah would have been an obvious expedient well within the ordinary skill in the art. Appellants disagree.

The Action includes a discussion of the Zeanah and Gutman references which fails to specifically point out or explain which elements and steps in the cited art allegedly correspond to the elements and steps recited in the claims. Thus, Appellants have been forced to speculate as to which elements in Zeanah and Gutman the Office regards as corresponding to the elements and steps recited in the claims.

Based on the assertions in the Action the Office appears to regard the "host automated transaction machine" recited in claim 25 as corresponding to the delivery system (12) disclosed in Zeanah.

However, even if the Office regards the delivery system (12) of Zeanah as corresponding to the host automated transaction machine recited in claim 25, the substitution of the electronic wallet (100) of Gutman for the (personal computer-18 and/or PDA-20) of Zeanah as asserted in the Action, would result in the delivery system (12) being connected to the electronic wallet of Gutman. There is no teaching, suggestion or motivation in the cited art to do this. However,

even after such a substitution, there would be no transaction function device (such as a cash dispenser for example) connected in the delivery system (12) of Zeanah. Thus, such an arrangement would still not disclose or suggest method step (a) recited in claim 25, in which a transaction service including a transaction function device is connected in a host automated transaction machine with a lookup service.

Claim 25 further recites that the method comprises: "(b) registering the transaction service with the lookup service, including storing a copy of a service proxy in association with the lookup service." Nowhere in either Zeanah or Gutman is it disclosed or suggested that a transaction service including a transaction function device is both connected in a host automated transaction machine, and is registered with a lookup service included in the host automated transaction machine. Further, neither reference discloses or suggests a service proxy, or the storing of a service proxy in association with the lookup service included in the host automated transaction machine. As a result, neither Zeanah nor Gutman discloses or suggests the features and relationships recited in method step (b) of claim 25.

Claim 25 further recites that the method comprises: "(c) acquiring by a personal automated teller machine ("ATM") through a wireless network port on the host automated transaction machine, a copy of the service proxy from the lookup service." It is respectfully submitted that neither Zeanah nor Gutman discloses or suggests a step in which a personal ATM acquires a copy of a service proxy from the lookup service of a host automated transaction machine. In addition neither reference discloses or suggests a personal ATM that acquires the copy of the service proxy through a wireless network port on the host automated transaction machine. Also, neither reference discloses or suggests a wireless network port on a host

automated transaction machine. As a result, neither Zeanah nor Gutman discloses or suggests the method step (c) of claim 25.

Claim 25 further recites that the method comprises: "(d) providing at least one input to an input device on the personal ATM; and (e) invoking a method of the service proxy through operation of the personal ATM responsive to the at least one input."

As discussed previously, neither Zeanah nor Gutman discloses or suggests a copy of a service proxy stored in a lookup service of a host automated transaction machine, which service proxy is acquired by a personal ATM through a wireless connection port of the host automated transaction machine. Further, neither reference discloses invoking a method of the service proxy through operation of a personal ATM. In addition neither reference discloses that the method is invoked responsive to an input provided to an input device on a personal ATM. As a result, neither Zeanah nor Gutman discloses or suggests the method steps (d) and (e) of claim 25.

Claim 25 further recites that the method comprises: "(f) operating the transaction function device of the transaction service responsive to the method invoked." It is respectfully submitted that neither Zeanah nor Gutman discloses or suggests operating a transaction function device of a transaction service connected to a host automated transaction machine responsive to a method invoked in a service proxy through operation of a personal ATM. Thus, neither Zeanah nor Gutman discloses or suggests the method step (f) recited in claim 25.

As nothing in the cited art discloses or suggests the features, relationships and steps that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Appellants' invention, it is

respectfully submitted that claim 25 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn.

Claim 44

Claim 44 is an independent claim which is directed to an apparatus. Claim 44 recites that the apparatus comprises a host ATM including a cash dispenser, at least one processor and at least one wireless network port. The cash dispenser is operative to dispense cash from the host ATM responsive to communication with at least one portable personal ATM through the at least one wireless network port.

Neither Zeanah nor Gutman discloses or suggests a host ATM which includes both a cash dispenser and at least one wireless network port. Further, neither reference discloses a host ATM with a cash dispenser that is operative to dispense cash from the host ATM responsive to communication with a portable personal ATM through the wireless network port of the host ATM.

Nothing in the cited art discloses or suggests the features, elements, and relationships that are specifically recited in the claim. There is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Appellants' invention. It is therefore respectfully submitted that claim 44 is allowable for these reasons. It is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 45-73 which depend from claim 44 are also allowable.

Claim 74

Claim 74 is an independent claim which is directed to a method. Claim 74 recites a method that includes: (a) receiving through at least one wireless network port of a host ATM at least one communication from a portable personal ATM; and (b) dispensing cash from the host ATM responsive to receipt of the at least one communication.

Neither Zeanah nor Gutman discloses or suggests dispensing cash from a host ATM responsive to receipt of at least one communication received from a portable personal ATM. Further, neither reference discloses or suggests dispensing cash from a host ATM responsive to the at least one communication received from a portable personal ATM through a wireless network port of the host ATM.

Nothing in the cited art discloses or suggests the features, elements, relationships, and steps that are specifically recited in the claim. There is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Appellants' invention. It is therefore respectfully submitted that claim 74 is allowable for these reasons. It is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 75-102 which depend from claim 74 are also allowable.

Claim 103

Claim 103 is an independent claim which is directed to a method. Claim 103 recites a method that includes: (a) receiving with a portable personal ATM from an external device, data representative of a first amount of value; (b) receiving through at least one input device of the portable personal ATM, at least one input; and (c) sending with the portable personal ATM

responsive to the at least one input, at least one communication through a wireless network port of a host ATM. Claim 103 further recites that the host ATM includes a cash dispenser and the at least one communication includes the data representative of a second amount of value.

As discussed previously, neither Zeanah nor Gutman discloses or suggests a wireless network port of a host ATM. Further neither reference discloses sending with the portable personal ATM at least one communication through a wireless network port of a host ATM. In addition, neither reference discloses or suggests sending the at least one communication responsive to at least one input received through at least one input device of the portable personal ATM. Further, neither reference discloses or suggests a step in which such a portable personal ATM also receives data representative of a first amount of value from an external device.

As nothing in the cited art discloses or suggests the features, elements, relationships, and steps that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Appellants' invention, it is respectfully submitted that claim 103 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 104-113 which depend from claim 103 are also allowable.

Claim 114

Claim 114 is an independent claim which is directed to a method. Claim 114 recites that the method includes: (a) receiving with a host ATM including a cash dispenser at least one communication from a portable personal ATM, wherein the at least one communication is produced by the portable personal ATM responsive to at least one input to an input device on the

portable personal ATM and includes data representative of an amount of value; (b) dispensing cash corresponding to the amount of value with the host ATM responsive to the receipt of the at least one communication in step (a).

Neither Zeanah nor Gutman discloses or suggests dispensing cash with a host ATM responsive to the receipt of at least one communication received with the host ATM from a portable personal ATM. Further, neither Zeanah nor Gutman discloses or suggests that the at least one communication includes data representative of an amount of value and that cash dispensed with the host ATM corresponds to the amount of value.

As nothing in the cited art discloses or suggests the features, elements, relationships, and steps that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Appellants' invention, it is respectfully submitted that claim 114 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 115 and 116 which depend from claim 114 are also allowable.

Claim 117

Claim 117 is an independent claim which is directed to a method. Claim 117 recites that the method includes: (a) storing a plurality of account numbers in a data store of a portable personal ATM; (b) receiving through at least one input device of the portable personal ATM, at least one input representative of a selected one of the plurality of account numbers and an amount of cash; and (c) sending at least one communication from the portable personal ATM through a wireless connection port of a host ATM including a cash dispenser, wherein the at least one

communication includes data representative of the selected one account number and the amount of cash.

Neither Zeanah nor Gutman discloses or suggests sending at least one communication from a portable personal ATM through a wireless connection port of a host ATM including a cash dispenser. Further neither reference discloses or suggests that the at least one communication includes data representative of a selected account number and an amount of cash.

Nothing in the cited art discloses or suggests the features, elements, relationships, and steps that are specifically recited in the claim. There is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Appellants' invention. It is therefore respectfully submitted that claim 117 is allowable for these reasons. It is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 118 and 119 which depend from claim 117 are also allowable.

The Dependent Claims Are Not Obvious Over Zeanah In View Of Gutman

Each of the dependent claims depends directly or indirectly from an independent claim. The independent claims have been previously shown to be allowable. "If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious" (MPEP 2143.03). *In re Fine*, 5 USPQ2d 1596 (Fed. Cir. 1988). Thus, it is asserted that the dependent claims are allowable on the same basis.

Furthermore, each of the dependent claims additionally recites specific features, relationships, and/or steps that further patentably distinguish the claimed invention over the applied art. Neither Zeanah nor Gutman, taken alone or in combination, disclose or suggest the

features, relationships, and/or steps that are specifically recited in the dependent claims. Thus, it is respectfully submitted that the dependent claims are further allowable due to the recitation of such additional features, relationships, and/or steps.

Claim 45

Claim 45 depends from claim 44 and further recites that the personal ATM comprises a phone. Neither Zeanah nor Gutman discloses or suggests a cash dispenser that is operative to dispense cash from a host ATM responsive to communication with a personal ATM that comprises a phone. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 45 is further allowable on this basis.

Claim 46

Claim 46 depends from claim 44 and further recites that the personal ATM comprises a PDA. Neither Zeanah nor Gutman discloses or suggests a cash dispenser that is operative to dispense cash from a host ATM responsive to communication with a personal ATM that comprises a PDA. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 46 is further allowable on this basis.

Claim 47

Claim 47 depends from claim 44 and further recites that the personal ATM comprises a notebook computer. Neither Zeanah nor Gutman discloses or suggests a cash dispenser that is operative to dispense cash from a host ATM responsive to communication with a personal ATM

that comprises a notebook computer. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 47 is further allowable on this basis.

Claim 48

Claim 48 depends from claim 44 and further recites that the personal ATM comprises a pager. Neither Zeanah nor Gutman discloses or suggests a cash dispenser that is operative to dispense cash from a host ATM responsive to communication with a personal ATM that comprises a pager. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 48 is further allowable on this basis.

Claim 49

Claim 49 depends from claim 44 and further recites that the communication with the personal ATM through the at least one wireless network port comprises a transfer of electronic money from the personal ATM. Neither Zeanah nor Gutman discloses or suggests electronic money or the transfer of electronic money from a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 49 is further allowable on this basis.

Claim 50

Claim 50 depends from claim 44 and further recites that the host ATM further comprises at least one data store in operative connection with the at least one processor. The at least one wireless network port is operative to deliver at least one service proxy from the host ATM to the

personal ATM. Neither Zeanah nor Gutman discloses or suggests a host ATM with a wireless network port that is operative to deliver a service proxy from a host ATM to a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 50 is further allowable on this basis.

Claim 51

Claim 51 depends from claim 50 and further recites that the at least one service proxy comprises a service proxy for a cash dispenser service. Neither Zeanah nor Gutman discloses or suggests a host ATM with a wireless network port that is operative to deliver a service proxy for a cash dispenser service from a host ATM to a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 51 is further allowable on this basis.

Claim 52

Claim 52 depends from claim 50 and further recites that the host ATM further comprises a lookup service, and that the lookup service is operative to cause the host ATM to deliver the at least one service proxy. Neither Zeanah nor Gutman discloses or suggests a host ATM with a lookup service that is operative to cause the host ATM to deliver the service proxy from a host ATM to a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 52 is further allowable on this basis.

Claim 53

Claim 53 depends from claim 44 and further recites that the host ATM further comprises at least one data store in operative connection with the at least one processor. The data store includes a plurality of interface pages, and at least one of the interface pages is delivered through the at least one wireless network port to the personal ATM. Neither Zeanah nor Gutman discloses or suggests a host ATM with a cash dispenser and a data store with a plurality of interface pages. Further, neither reference discloses or suggests that the interface pages are delivered through a wireless network port of the host ATM to the personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 53 is further allowable on this basis.

Claim 54

Claim 54 depends from claim 53 and further recites that the at least one of the interface pages includes instructions in at least one of HTML, XML, WML and JavaScript. Neither Zeanah nor Gutman discloses or suggests a host ATM with interface pages in a data store that include instructions in either HTML, XML, WML, or JavaScript. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 54 is further allowable on this basis.

Claim 55

Claim 55 depends from claim 53 and further recites that the at least one data store in the host ATM includes a plurality of display screen service proxies. At least one of the plurality of

interface pages corresponds to one of the display screen service proxies. The host ATM is operative to deliver a first display screen service proxy and the at least one of the interface pages corresponding to the first display screen service proxy through the at least one wireless network port. Neither Zeanah nor Gutman discloses or suggests a data store in a host ATM which includes display screen service proxies. Further, neither reference discloses or suggests an interface page in the data store which corresponds to a display screen service proxy. In addition, neither reference discloses or suggests that a host ATM is operative to deliver a display screen service proxy and an interface page corresponding to the display screen service proxy through a wireless network port of the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 55 is further allowable on this basis.

Claim 56

Claim 56 depends from claim 55 and further recites that the host ATM is operative to output the first display screen service proxy responsive to receipt of the at least one lookup message received from the personal ATM through the at least one wireless network port. Neither Zeanah nor Gutman discloses or suggests a host ATM that is operative to output a first display screen service proxy responsive to receipt of a lookup message received from the personal ATM through a wireless network port of the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 56 is further allowable on this basis.

Claim 57

Claim 57 depends from claim 50 and further recites that the host ATM further comprises a network banking service. The at least one service proxy delivered from the at least one wireless network port is a service proxy for the network banking service. Neither Zeanah nor Gutman discloses or suggests a host ATM that comprises a network banking service. In addition, neither reference discloses that a service proxy delivered from the at least one wireless network port is a service proxy for the network banking service. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 57 is further allowable on this basis.

Claim 58

Claim 58 depends from claim 50 and further recites that the service proxy delivered by the host ATM includes a service proxy for the cash recycler service. Neither Zeanah nor Gutman discloses or suggests the service proxy delivered by the host ATM to a personal ATM includes a service proxy for a cash recycler service. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 58 is further allowable on this basis.

Claim 59

Claim 59 depends from claim 44 and recites that the apparatus further comprises a personal ATM. The personal ATM comprises at least one input device. The host ATM is operative to dispense cash responsive to at least one input to the at least one input device.

Neither Zeanah nor Gutman discloses or suggests a host ATM that is operative to dispense cash responsive to an input to an input device of a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 59 is further allowable on this basis.

Claim 60

Claim 60 depends from claim 59 and further recites that the personal ATM comprises at least one processor and at least one data store. When the personal ATM is not in communication with the at least one wireless network port of the host ATM, the personal ATM is operative responsive to the at least one input, to store data corresponding to at least one offline transaction in the at least one data store of the personal ATM. Neither Zeanah nor Gutman discloses or suggests a personal ATM that when not in communication with a wireless network port of a host ATM, is operative to store data corresponding to at least one offline transaction in a data store of the personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 60 is further allowable on this basis.

Claim 61

Claim 61 depends from claim 60 and further recites that when the personal ATM is in operative connection with the at least one wireless network port, the personal ATM is operative responsive to the stored data corresponding to the at least one offline transaction to cause cash to be dispensed from the cash dispenser of the host ATM. Neither Zeanah nor Gutman discloses or suggests a personal ATM that is operative responsive to stored data corresponding to an offline

transaction to cause cash to be dispensed from a cash dispenser of a host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 61 is further allowable on this basis.

Claim 62

Claim 62 depends from claim 60 and further recites that the personal ATM includes at least one virtual service. The data corresponding to the at least one offline transaction is stored responsive to the at least one virtual service. Neither Zeanah nor Gutman discloses or suggests a personal ATM with a virtual service. Further, neither reference discloses offline transaction data that is stored responsive to the at least one virtual service. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 62 is further allowable on this basis.

Claim 63

Claim 63 depends from claim 59 and further recites that the personal ATM comprises at least one personal ATM service. The personal ATM is operative to deliver at least one personal ATM service proxy corresponding to the at least one personal ATM service to the host ATM through the at least one wireless network port. Neither Zeanah nor Gutman discloses or suggests a personal ATM that is operative to deliver a personal ATM service proxy to the host ATM through at least one wireless network port. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 63 is further allowable on this basis.

Claim 64

Claim 64 depends from claim 63 and further recites that the personal ATM comprises at least one data store, and wherein the at least one data store includes data corresponding to electronic money, and wherein electronic money is enabled to be transferred between the personal ATM and the host ATM responsive to the at least one personal ATM service. Neither Zeanah nor Gutman discloses or suggests a personal ATM with a data store that includes data corresponding to electronic money. Further, neither reference discloses or suggests enabling the transfer of electronic money between the personal ATM and the host ATM responsive to a personal ATM service. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 64 is further allowable on this basis.

Claim 65

Claim 65 depends from claim 63 and further recites that the personal ATM comprises at least one data store. The data store includes data representative of at least one account number. The account number is enabled to be transferred between the personal ATM and the host ATM responsive to the at least one personal ATM service. Neither Zeanah nor Gutman discloses or suggests that an account number stored in a data store of a personal ATM is enabled to be transferred between the personal ATM and a host ATM responsive to a personal ATM service. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 65 is further allowable on this basis.

Claim 66

Claim 66 depends from claim 65 and further recites that the personal ATM includes a plurality of account numbers in the at least one data store. A selected one of the plurality of account numbers is transferred between the personal ATM and the host ATM responsive to at least one input to the at least one input device. Neither Zeanah nor Gutman discloses or suggests that a selected one of a plurality of account numbers is transferred between the personal ATM and the host ATM responsive to an input to an input device of the personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 66 is further allowable on this basis.

Claim 67

Claim 67 depends from claim 63 and further recites that the personal ATM comprises at least one data store. The at least one data store includes data representative of transactions conducted with the personal ATM. The at least one personal ATM service is operative to deliver the data representative of transactions to an accounting application.

As discussed previously, neither Zeanah nor Gutman discloses or suggests a host ATM that is operative to dispense cash responsive to an input to an input device of a personal ATM. Further neither reference discloses or suggests that such a personal ATM is also operative to deliver data representative of transactions conducted with the personal ATM to an accounting application. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 67 is further allowable on this basis.

Claim 68

Claim 68 depends from claim 63 and further recites that the personal ATM comprises a display. The display of the personal ATM is operative responsive to the at least one personal ATM service to output at least one menu. Neither Zeanah nor Gutman discloses or suggests a display of a personal ATM that is operative responsive to a personal ATM service to output at least one menu. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 68 is further allowable on this basis.

Claim 69

Claim 69 depends from claim 68 and further recites that the host ATM is operative to dispense cash responsive to the at least one input being provided in response to the output of the at least one menu. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 69 is further allowable on this basis.

Claim 70

Claim 70 depends from claim 69 and further recites that the host ATM is operative to deliver at least one service proxy to the personal ATM through the at least one wireless network port. Neither Zeanah nor Gutman discloses or suggests a host ATM that is operative to deliver at least one service proxy to the personal ATM through the at least one wireless network port. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 70 is further allowable on this basis.

Claim 71

Claim 71 depends from claim 70 and further recites that at least one feature in the at least one menu output through the personal ATM is generated responsive to the delivery of the at least one service proxy from the host ATM to the personal ATM. Neither Zeanah nor Gutman discloses or suggests that a feature in a menu output through a personal ATM is generated responsive to the delivery of a service proxy from the host ATM to the personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 71 is further allowable on this basis.

Claim 72

Claim 72 depends from claim 63 and further recites that the host ATM comprises a lookup service. The at least one personal ATM service proxy is registered in connection with the lookup service. Neither Zeanah nor Gutman discloses or suggests that a host ATM comprises a lookup service. Further, neither reference discloses or suggests that a personal ATM service proxy is registered in connection with the lookup service. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 72 is further allowable on this basis.

Claim 73

Claim 73 depends from claim 59 and further recites that the personal ATM comprises at least one data store. The host ATM is operative to deliver a cash dispenser service proxy to the data store in the personal ATM through the at least one wireless network port. The at least one

input is operative to cause cash to be dispensed from the cash dispenser by calling at least one withdrawal method of the cash dispenser service proxy. Neither Zeanah nor Gutman discloses or suggests a host ATM that is operative to deliver a cash dispenser service proxy to a data store in a personal ATM through the at least one wireless network port. Further, neither reference discloses that at least one input to the input device of the personal ATM is operative to cause cash to be dispensed from the cash dispenser of the host ATM by calling at least one withdrawal method of the cash dispenser service proxy. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 73 is further allowable on this basis.

Claim 75

Claim 75 depends from independent method claim 74 and further recites that prior to step (a) the method further comprises delivering through the at least one wireless network port to the personal ATM, a service proxy corresponding to at least one service of the host ATM. Neither Zeanah nor Gutman discloses or suggests delivering a service proxy to a personal ATM through a wireless network port of a host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 75 is further allowable on this basis.

Claim 76

Claim 76 depends from claim 75 and further recites that in the delivering step the service proxy delivered is a service proxy for a cash dispenser service, and that the cash dispenser service includes the cash dispenser. Neither Zeanah nor Gutman discloses or suggests delivering a service proxy for a cash dispenser service to a personal ATM. As nothing in the applied art

discloses or suggests these features, it is respectfully submitted that claim 76 is further allowable on this basis.

Claim 77

Claim 77 depends from claim 74 and recites that the method further comprises: (c) delivering through the at least one wireless network port to the personal ATM, at least one interface page; and (d) providing an output on a display of the personal ATM responsive to the at least one interface page. Neither Zeanah nor Gutman discloses or suggests delivering an interface page through a wireless network port of a host ATM to a personal ATM. In addition, neither reference discloses or suggests providing an output on a display of the personal ATM responsive to the interface page. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 77 is further allowable on this basis.

Claim 78

Claim 78 depends from claim 77 and further recites that prior to step (c) the method further comprises: (e) delivering to the host ATM through the at least one wireless network port, from the personal ATM, at least one communication indicative of at least one display property associated with the display of the personal ATM. The at least one interface page delivered in step (c) is delivered responsive to the at least one communication indicative of the at least one display property. Neither Zeanah nor Gutman discloses or suggests delivering at least one communication indicative of a display property associated with the display of the personal ATM to the host ATM through the wireless network. In addition, neither reference discloses or

suggests that an interface page is delivered to the personal ATM responsive to the communication indicative of the display property. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 78 is further allowable on this basis.

Claim 79

Claim 79 depends from claim 78 and further recites that step (e) includes delivering a service proxy corresponding to a service of the personal ATM, to a lookup service in the host ATM. Neither Zeanah nor Gutman discloses or suggests delivering a service proxy corresponding to a service of the personal ATM to a lookup service in the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 79 is further allowable on this basis.

Claim 80

Claim 80 depends from claim 78 and further recites that the host ATM includes at least one data store. The at least one data store includes data corresponding to a plurality of interface pages, including interface pages adapted to provide a variety of different outputs on different categories of displays, which displays may be included on a plurality of personal ATM types. In step (c) the at least one interface page delivered is suited to the category of display on the particular personal ATM which provides the message in step (a). Neither Zeanah nor Gutman discloses or suggests delivering an interface page to the personal ATM which is suited to the category of display on the particular personal ATM which provides the communication to the

host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 80 is further allowable on this basis.

Claim 81

Claim 81 depends from claim 74 and recites that the method further comprises: (c) providing at least one input to at least one input device of the personal ATM. The at least one communication in step (a) is produced by the personal ATM in response to the at least one input. Neither Zeanah nor Gutman discloses or suggests dispensing cash from the host ATM responsive to receipt of the at least one communication provided in response to at least one input to an input device of a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 81 is further allowable on this basis.

Claim 82

Claim 82 depends from claim 81 and recites that prior to step (b) the method further comprises: (d) storing in at least one data store in the personal ATM, data corresponding to the at least one input provided in step (b); and (e) at a time subsequent to step (d) generating with the personal ATM the at least one communication received by the host ATM in step (a). Neither Zeanah nor Gutman discloses or suggests storing data in a data store of a personal ATM which corresponds to an input to an input device of the personal ATM. Further, neither reference discloses at a subsequent time to the storing of the data, generating with the personal ATM the communication received by the host ATM from the personal ATM responsive to the input. As

nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 82 is further allowable on this basis.

Claim 83

Claim 83 depends from claim 74 and recites that the method further comprises: (c) delivering electronic money from the personal ATM to the host ATM through the at least one wireless network port. Neither Zeanah nor Gutman discloses or suggests delivering electronic money from a personal ATM to a host ATM through a wireless network port. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 83 is further allowable on this basis.

Claim 84

Claim 84 depends from claim 74 and recites that the method further comprises: (c) receiving electronic money from the host ATM with the personal ATM through the at least one wireless network port. Neither Zeanah nor Gutman discloses or suggests receiving electronic money from a host ATM with a personal ATM through a wireless network port. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 84 is further allowable on this basis.

Claim 85

Claim 85 depends from claim 84 and recites that the method further comprises: (d) delivering electronic money from the personal ATM to the host ATM through the at least one

wireless network port. Neither Zeanah nor Gutman discloses or suggests delivering electronic money from a personal ATM to a host ATM through a wireless network port. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 85 is further allowable on this basis.

Claim 86

Claim 86 depends from claim 74 and recites that the method further comprises: (d) delivering from the personal ATM to the host ATM through the at least one wireless network port, at least one service proxy corresponding to a service in the personal ATM. Neither Zeanah nor Gutman discloses or suggests delivering a service proxy corresponding to a service in a personal ATM, from the personal ATM to a host ATM through a wireless network port. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 86 is further allowable on this basis.

Claim 87

Claim 87 depends from claim 86 and recites that subsequent to step (c) the method further comprises: (b) registering the at least one service proxy delivered in step (c) in connection with a lookup service in the host ATM. Neither Zeanah nor Gutman discloses or suggests registering a service proxy corresponding to a service in a personal ATM in connection with a lookup service in the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 87 is further allowable on this basis.

Claim 88

Claim 88 depends from claim 74 and recites that prior to step (a) the method further comprises: (c) storing a plurality of account numbers in a data store of the personal ATM, and wherein the at least one communication in step (a) includes communication of at least one of the plurality of account numbers to the host ATM. Neither Zeanah nor Gutman discloses or suggests dispensing cash from a host ATM responsive to receipt of the at least one communication that includes communication of at least one of a plurality of account numbers stored in a data store of a personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 88 is further allowable on this basis.

Claim 89

Claim 89 depends from claim 88 and recites that prior to step (c) the method further comprises: (d) providing at least one input through at least one input device of the personal ATM. The at least one input corresponds to a selection of one of the plurality of account numbers. In step (a) the one account number is communicated to the host ATM. Neither Zeanah nor Gutman discloses or suggests communicating a selection of one of a plurality of account numbers to the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 89 is further allowable on this basis.

Claim 90

Claim 90 depends from claim 74 and recites that the method further comprises: (c) storing at least one record in a data store of the personal ATM, the record including data

representative of the dispensing of cash from the host ATM. Neither Zeanah nor Gutman discloses or suggests storing a record in a data store of a personal ATM that includes data representative of the dispensing of cash from a host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 90 is further allowable on this basis.

Claim 91

Claim 91 depends from claim 90 and recites that the method further comprises: (d) delivering the record stored in the data store in step (c) to an accounting application. Neither Zeanah nor Gutman discloses or suggests delivering a record including data representative of a dispensing of cash from a host ATM to an accounting application. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 91 is further allowable on this basis.

Claim 92

Claim 92 depends from claim 74 and recites that in step (a) the personal ATM comprises a cell phone. Neither Zeanah nor Gutman discloses or suggests dispensing cash from a host ATM responsive to receipt of at least one communication from a portable personal ATM that comprises a cell phone. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 92 is further allowable on this basis.

Claim 93

Claim 93 depends from claim 74 and recites that in step (a) the personal ATM comprises a PDA. Neither Zeanah nor Gutman discloses or suggests dispensing cash from a host ATM responsive to receipt of at least one communication from a portable personal ATM that comprises a PDA. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 93 is further allowable on this basis.

Claim 94

Claim 94 depends from claim 74 and recites that in step (a) the personal ATM comprises a notebook computer. Neither Zeanah nor Gutman discloses or suggests dispensing cash from a host ATM responsive to receipt of at least one communication from a portable personal ATM that comprises a notebook computer. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 94 is further allowable on this basis.

Claim 95

Claim 95 depends from claim 74 and recites that in step (a) the personal ATM comprises a pager. Neither Zeanah nor Gutman discloses or suggests dispensing cash from a host ATM responsive to receipt of at least one communication from a portable personal ATM that comprises a pager. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 95 is further allowable on this basis.

Claim 96

Claim 96 depends from claim 74 and recites that in step (a) the at least one wireless network port communicates RF messages. Neither Zeanah nor Gutman discloses or suggests that the at least one wireless network port of a host ATM communicates RF messages. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 96 is further allowable on this basis.

In addition claim 96 was objected to in the Action. The Action indicated that "RF messages" should be replaced with --radio frequency ("RF") messages--. Appellants believe that the "RF" terminology is sufficiently definite as it is a well-known term to those skilled in the relevant art, but are willing to clarify the features recited in the claim in this manner to remove the objection.

Claim 97

Claim 97 depends from claim 74 and recites computer readable media bearing instructions which are operative to cause at least one computer in the host ATM to cause the host ATM to carry out the method steps recited in claim 74. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 97 is further allowable on this basis.

Claim 98

Claim 98 depends from claim 74 and recites that the method further comprises receiving with the host ATM data representative of an amount of value from the portable personal ATM.

In addition step (b) includes dispensing an amount of cash corresponding to the data representative of the amount of value. Neither Zeanah nor Gutman discloses or suggests receiving with a host ATM data representative of an amount of value from a portable personal ATM. In addition neither reference discloses or suggests dispensing an amount of cash corresponding to the data representative of the amount of value. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 98 is further allowable on this basis.

Claim 99

Claim 99 depends from claim 74 and recites that in step (a) the at least one communication includes receiving from a portable personal ATM data representative of an amount of value. In addition, step (b) includes dispensing cash corresponding to the amount of value. Neither Zeanah nor Gutman discloses or suggests that the at least one communication received through at least one wireless network port of a host ATM includes receiving from a portable personal ATM data representative of an amount of value. Further neither reference discloses or suggests dispensing cash corresponding to the amount of value. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 99 is further allowable on this basis.

Claim 100

Claim 100 depends from claim 99 and recites that in step (a) the at least one communication includes data representative of value. In addition in step (b) an amount of cash is

dispensed from a cash dispenser which corresponds to the data representative of value. Neither Zeanah nor Gutman discloses or suggests that the at least one communication received through at least one wireless network port of a host ATM includes data representative of value. Further, neither reference discloses or suggests dispensing an amount of cash from a cash dispenser which corresponds to the data representative of value. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 100 is further allowable on this basis.

Claim 101

Claim 101 depends from claim 100 and recites that in step (b) the data representative of value corresponds to electronic money. Neither Zeanah nor Gutman discloses or suggests data representative of value which corresponds to electronic money. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 101 is further allowable on this basis.

Claim 102

Claim 102 depends from claim 100 and recites that in step (b) the data representative of value includes encrypted information. Neither Zeanah nor Gutman discloses or suggests data representative of value which includes encrypted information. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 102 is further allowable on this basis.

Claim 104

Claim 104 depends from claim 103 and recites that the method further comprises dispensing cash from the cash dispenser of the host ATM responsive to the at least one communication. In addition, claim 104 recites that the cash dispensed corresponds to the second amount of value. Neither Zeanah nor Gutman discloses or suggests dispensing cash from the cash dispenser of the host ATM responsive to the at least one communication sent with the portable personal ATM. Further neither reference discloses or suggests that the cash dispensed corresponds to the second amount of value included in the at least one communication. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 104 is further allowable on this basis.

Claim 105

Claim 105 depends from claim 103 and recites that in step (c) the data representative of the second amount of value corresponds to electronic money. Neither Zeanah nor Gutman discloses or suggests that data included in at least one communication sent through a wireless network port of a host ATM corresponds to electronic money. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 105 is further allowable on this basis.

Claim 106

Claim 106 depends from claim 103 and recites that in step (c) the data representative of the second amount of value includes encrypted information. Neither Zeanah nor Gutman

discloses or suggests that data included in at least one communication sent through a wireless network port of a host ATM includes encrypted information. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 106 is further allowable on this basis.

Claim 107

Claim 107 depends from claim 103 and recites that in step (a) the data representative of the first amount of value is provided to the portable personal ATM from an external device other than the host ATM. Neither Zeanah nor Gutman discloses or suggests that a portable personal ATM which sends at least one communication through a wireless network port of a host ATM also receives data representative of a first amount of value from an external device other than the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 107 is further allowable on this basis.

Claim 108

Claim 108 depends from claim 107 and recites that in step (a) the external device includes a further host ATM. Neither Zeanah nor Gutman discloses or suggests receiving with a portable personal ATM data representative of a first amount of value from an external device that includes a further host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 108 is further allowable on this basis.

Claim 109

Claim 109 depends from claim 107 and recites that in step (a) the external device includes a further portable personal ATM. Neither Zeanah nor Gutman discloses or suggests that a portable personal ATM which sends at least one communication through a wireless network port of a host ATM also receives data representative of a first amount of value from an external device which includes a further portable personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 109 is further allowable on this basis.

Claim 110

Claim 110 depends from claim 107 and recites that in step (a) the external device is in communication with a host banking system. Neither Zeanah nor Gutman discloses or suggests that a portable personal ATM which sends at least one communication through a wireless network port of a host ATM also receives data representative of a first amount of value from an external device that is in communication with a host banking system. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 110 is further allowable on this basis.

Claim 111

Claim 111 depends from claim 107 and recites that in step (a) the data representative of the first amount of value is received through a wireless network port of the portable personal ATM. Neither Zeanah nor Gutman discloses or suggests that a portable personal ATM which

sends at least one communication through a wireless network port of a host ATM also receives data representative of a first amount of value through a wireless network port of the portable personal ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 111 is further allowable on this basis.

Claim 112

Claim 112 depends from claim 103 and recites that the method further comprises receiving cash corresponding to the second amount of value from the host ATM responsive to the at least one communication sent in step (c). Neither Zeanah nor Gutman discloses or suggests receiving cash corresponding to a second amount of value from a host ATM responsive to at least one communication sent through a wireless network port of a host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 112 is further allowable on this basis.

Claim 113

Claim 113 depends from claim 103 and recites computer readable media bearing instructions which are operative to cause at least one portable personal ATM to cause the portable personal ATM to carry out the method steps recited in claim 103. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 113 is further allowable on this basis.

Claim 115

Claim 115 depends from claim 114 and recites that the method further comprises debiting an account corresponding to the portable personal ATM for the amount of value through operation of the host ATM responsive to dispensing cash in step (b). Neither Zeanah nor Gutman discloses or suggests debiting an account corresponding to a portable personal ATM for an amount of value through operation of the host ATM responsive to dispensing cash. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 115 is further allowable on this basis.

Claim 116

Claim 116 depends from claim 114 and recites computer readable media bearing instructions which are operative to cause at least one computer in a host ATM to cause the host ATM to carry out the method steps recited in claim 114. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 116 is further allowable on this basis.

Claim 118

Claim 118 depends from claim 117 and recites that the method further comprises dispensing cash corresponding to the amount from the cash dispenser of the host ATM responsive to the at least one communication in step (c). Neither Zeanah nor Gutman discloses or suggests dispensing cash corresponding to an amount from a cash dispenser of a host ATM responsive to at least one communication sent from a portable personal ATM through a wireless

connection port of the host ATM. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 118 is further allowable on this basis.

Claim 119

Claim 119 depends from claim 117 and recites computer readable media bearing instructions which are operative to cause at least one portable personal ATM to cause the portable personal ATM to carry out the method steps recited in claim 117. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 119 is further allowable on this basis.

FEES FOR THIS SUBMISSION

Please charge the fee due upon the filing of this Brief and any other fees that may be due, to the Deposit Account No. 09-0428 (InterBold).

CONCLUSION

Each of Appellants' pending claims particularly points out and distinctly claims the subject matter which Appellants regard as the invention. In addition, each of Appellants' pending claims specifically recites features and relationships that are neither disclosed nor suggested in any of the applied art. Furthermore, the applied art is devoid of any teaching, suggestion, or motivation for combining features of the applied art so as to produce Appellants' invention. Allowance of all of Appellants' pending claims is therefore respectfully requested.

Respectfully submitted,



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Appendix

Pending Claims in Application Serial No. 09/881,718

25. A method comprising:

- (a) connecting a transaction service in a host automated transaction machine, wherein the transaction service includes at least one transaction function device, and wherein the host automated transaction machine includes a lookup service;
- (b) registering the transaction service with the lookup service, including storing a copy of a service proxy in association with the lookup service;
- (c) acquiring by a personal automated teller machine ("ATM") through a wireless network port on the host automated transaction machine, a copy of the service proxy from the lookup service;
- (d) providing at least one input to an input device on the personal ATM;
- (e) invoking a method of the service proxy through operation of the personal ATM responsive to the at least one input; and

- (f) operating the transaction function device of the transaction service responsive to the method invoked.

44. Apparatus comprising:

a host ATM including a cash dispenser, at least one processor and at least one wireless network port, wherein the cash dispenser is operative to dispense cash from the host ATM responsive to communication with at least one portable personal ATM through the at least one wireless network port.

- 45. The apparatus according to claim 44, wherein the personal ATM comprises a phone.
- 46. The apparatus according to claim 44, wherein the personal ATM comprises a personal digital assistant ("PDA").
- 47. The apparatus according to claim 44, wherein the personal ATM comprises a notebook computer.
- 48. The apparatus according to claim 44, wherein the personal ATM comprises a pager.

49. The apparatus according to claim 44, wherein the communication with the personal ATM through the at least one wireless network port comprises a transfer of electronic money from the personal ATM.
50. The apparatus according to claim 44, wherein the host ATM further comprises at least one data store in operative connection with the at least one processor, and wherein the at least one wireless network port is operative to deliver at least one service proxy from the host ATM to the personal ATM.
51. The apparatus according to claim 50, wherein the at least one service proxy comprises a service proxy for a cash dispenser service.
52. The apparatus according to claim 50, wherein the host ATM further comprises a lookup service, and wherein the lookup service is operative to cause the host ATM to deliver the at least one service proxy.
53. The apparatus according to claim 44, further comprising at least one data store in operative connection with the at least one processor, and wherein the data store includes a plurality of interface pages, and wherein at least one of the interface pages is delivered through the at least one wireless network port to the personal ATM.

54. The apparatus according to claim 53, wherein the at least one of the interface pages includes instructions in at least one of hypertext markup language ("HTML"), extensible markup language ("XML"), wireless markup language ("WML") and JavaScript.
55. The apparatus according to claim 53, wherein the at least one data store in the host ATM includes a plurality of display screen service proxies, wherein at least one of the plurality of interface pages corresponds to one of the display screen service proxies, and wherein the host ATM is operative to deliver a first display screen service proxy and the at least one of the interface pages corresponding to the first display screen service proxy through the at least one wireless network port.
56. The apparatus according to claim 55, wherein the host ATM is operative to output the first display screen service proxy responsive to receipt of the at least one lookup message received from the personal ATM through the at least one wireless network port.
57. The apparatus according to claim 50, wherein the host ATM further comprises a network banking service, and wherein the at least one service proxy delivered from the at least one wireless network port is a service proxy for the network banking service.

58. The apparatus according to claim 50, wherein the service proxy delivered by the host ATM includes a service proxy for the cash recycler service.
59. The apparatus according to claim 44, and further comprising a personal ATM, wherein the personal ATM comprises at least one input device, wherein the host ATM is operative to dispense cash responsive to at least one input to the at least one input device.
60. The apparatus according to claim 59, wherein the personal ATM comprises at least one processor and at least one data store, and wherein when the personal ATM is not in communication with the at least one wireless network port of the host ATM, the personal ATM is operative responsive to the at least one input, to store data corresponding to at least one offline transaction in the at least one data store of the personal ATM.
61. The apparatus according to claim 60, wherein when the personal ATM is in operative connection with the at least one wireless network port, the personal ATM is operative responsive to the stored data corresponding to the at least one offline transaction to cause cash to be dispensed from the cash dispenser of the host ATM.

62. The apparatus according to claim 60, wherein the personal ATM includes at least one virtual service, and wherein the data corresponding to the at least one offline transaction is stored responsive to the at least one virtual service.
63. The apparatus according to claim 59, wherein the personal ATM comprises at least one personal ATM service, and wherein the personal ATM is operative to deliver at least one personal ATM service proxy corresponding to the at least one personal ATM service to the host ATM through the at least one wireless network port.
64. The apparatus according to claim 63, wherein the personal ATM comprises at least one data store, and wherein the at least one data store includes data corresponding to electronic money, and wherein electronic money is enabled to be transferred between the personal ATM and the host ATM responsive to the at least one personal ATM service.
65. The apparatus according to claim 63, wherein the personal ATM comprises at least one data store, and wherein the data store includes data representative of at least one account number, and wherein the account number is enabled to be transferred between the personal ATM and the host ATM responsive to the at least one personal ATM service.

66. The apparatus according to claim 65, wherein the personal ATM includes a plurality of account numbers in the at least one data store, and wherein a selected one of the plurality of account numbers is transferred between the personal ATM and the host ATM responsive to at least one input to the at least one input device.
67. The apparatus according to claim 63, wherein the personal ATM comprises at least one data store, and wherein the at least one data store includes data representative of transactions conducted with the personal ATM, and wherein the at least one personal ATM service is operative to deliver the data representative of transactions to an accounting application.
68. The apparatus according to claim 63, wherein the personal ATM comprises a display, and wherein the display of the personal ATM is operative responsive to the at least one personal ATM service to output at least one menu.
69. The apparatus according to claim 68, wherein the host ATM is operative to dispense cash responsive to the at least one input being provided in response to the output of the at least one menu.
70. The apparatus according to claim 69, wherein the host ATM is operative to deliver at least one service proxy to the personal ATM through the at least one wireless network port.

71. The apparatus according to claim 70, wherein at least one feature in the at least one menu output through the personal ATM is generated responsive to the delivery of the at least one service proxy from the host ATM to the personal ATM.
72. The apparatus according to claim 63, wherein the host ATM comprises a lookup service, and wherein the at least one personal ATM service proxy is registered in connection with the lookup service.
73. The apparatus according to claim 59, wherein the personal ATM comprises at least one data store, and wherein the host ATM is operative to deliver a cash dispenser service proxy to the data store in the personal ATM through the at least one wireless network port, and wherein the at least one input is operative to cause cash to be dispensed from the cash dispenser by calling at least one withdrawal method of the cash dispenser service proxy.
74. A method comprising:
- (a) receiving through at least one wireless network port of a host ATM at least one communication from a portable personal ATM;

- (b) dispensing cash from the host ATM responsive to receipt of the at least one communication.

75. The method according to claim 74, and prior to step (a) further comprising:

delivering through the at least one wireless network port to the personal ATM, a service proxy corresponding to at least one service of the host ATM.

76. The method according to claim 75, wherein in the delivering step the service proxy delivered is a service proxy for a cash dispenser service, wherein the cash dispenser service includes the cash dispenser.

77. The method according to claim 74 and further comprising:

- (c) delivering through the at least one wireless network port to the personal ATM, at least one interface page;

- (d) providing an output on a display of the personal ATM responsive to the at least one interface page.

78. The method according to claim 77 and prior to step (c) further comprising:

- (e) delivering to the host ATM through the at least one wireless network port, from the personal ATM, at least one communication indicative of at least one display property associated with the display of the personal ATM, wherein the at least one interface page delivered in step (c) is delivered responsive to the at least one communication indicative of the at least one display property.
79. The method according to claim 78, wherein step (e) includes delivering a service proxy corresponding to a service of the personal ATM, to a lookup service in the host ATM.
80. The method according to claim 78, wherein the host ATM includes at least one data store, wherein the at least one data store includes data corresponding to a plurality of interface pages, including interface pages adapted to provide a variety of different outputs on different categories of displays, which displays may be included on a plurality of personal ATM types, and wherein in step (c) the at least one interface page delivered is suited to the category of display on the particular personal ATM which provides the at least one communication in step (a).
81. The method according to claim 74 and further comprising:

- (c) providing at least one input to at least one input device of the personal ATM, wherein the at least one communication in step (a) is produced by the personal ATM in response to the at least one input.

82. The method according to claim 81 and prior to step (b) further comprising:

- (d) storing in at least one data store in the personal ATM, data corresponding to the at least one input provided in step (b);
- (e) at a time subsequent to step (d) generating with the personal ATM the at least one communication received by the host ATM in step (a).

83. The method according to claim 74, and further comprising:

- (c) delivering electronic money from the personal ATM to the host ATM through the at least one wireless network port.

84. The method according to claim 74 and further comprising:

- (c) receiving electronic money from the host ATM with the personal ATM through the at least one wireless network port.

85. The method according to claim 84, and further comprising:
- (d) delivering electronic money from the personal ATM to the host ATM through the at least one wireless network port.
86. The method according to claim 74, and further comprising:
- (d) delivering from the personal ATM to the host ATM through the at least one wireless network port, at least one service proxy corresponding to a service in the personal ATM.
87. The method according to claim 86, and subsequent to step (c) further comprising:
- (b) registering the at least one service proxy delivered in step (c) in connection with a lookup service in the host ATM.
88. The method according to claim 74, and prior to step (a), comprising:
- (c) storing a plurality of account numbers in a data store of the personal ATM, and wherein the at least one communication in step (a) includes communication of at least one of the plurality of account numbers to the host ATM.

89. The method according to claim 88, and prior to step (c) comprising:
- (d) providing at least one input through at least one input device of the personal ATM, the at least one input corresponding to a selection of one of the plurality of account numbers, wherein in step (a) the one account number is communicated to the host ATM.
90. The method according to claim 74, and further comprising:
- (c) storing at least one record in a data store of the personal ATM including data representative of the dispensing of cash from the host ATM.
91. The method according to claim 90, and further comprising:
- (d) delivering the record stored in the data store in step (c) to an accounting application.
92. The method according to claim 74, wherein in step (a) the personal ATM comprises a cell phone.
93. The method according to claim 74, wherein in step (a) the personal ATM comprises a PDA.

94. The method according to claim 74, wherein in step (a) the personal ATM comprises a notebook computer.
95. The method according to claim 74, wherein in step (a) the personal ATM comprises a pager.
96. The method according to claim 74, wherein in step (a) the at least one wireless network port communicates RF messages.
97. Computer readable media bearing instructions which are operative to cause at least one computer in the host ATM to cause the host ATM to carry out the method steps recited in claim 74.
98. The method according to claim 74, further comprising:
- receiving with the host ATM data representative of an amount of value from the portable personal ATM, wherein step (b) includes dispensing an amount of cash corresponding to the data representative of the amount of value.
99. The method according to claim 74, wherein in step (a) the at least one communication includes receiving from a portable personal ATM data

representative of an amount of value, and wherein step (b) includes dispensing cash corresponding to the amount of value.

100. The method according to claim 99, further comprising:

wherein in step (a) the at least one communication includes data representative of value, wherein in step (b) an amount of cash is dispensed from a cash dispenser which corresponds to the data representative of value.

101. The method according to claim 100, wherein in step (b) the data representative of value corresponds to electronic money.

102. The method according to claim 100, wherein in step (b) the data representative of value includes encrypted information.

103. A method comprising:

(a) receiving with a portable personal ATM from an external device, data representative of a first amount of value;

- (b) receiving through at least one input device of the portable personal ATM, at least one input; and
- (c) sending with the portable personal ATM responsive to the at least one input, at least one communication through a wireless network port of a host ATM, wherein the host ATM includes a cash dispenser, wherein the at least one communication includes the data representative of a second amount of value.

104. The method according to claim 103, further comprising:

- (d) dispensing cash from the cash dispenser of the host ATM responsive to the at least one communication, wherein the cash dispensed corresponds to the second amount of value.

105. The method according to claim 103, wherein in step (c) the data representative of the second amount of value corresponds to electronic money.

106. The method according to claim 103, wherein in step (c) the data representative of the second amount of value includes encrypted information.

107. The method according to claim 103, wherein in step (a) the data representative of the first amount of value is provided to the portable personal ATM from an external device other than the host ATM.
108. The method according to claim 107, wherein in step (a) the external device includes a further host ATM.
109. The method according to claim 107, wherein in step (a) the external device includes a further portable personal ATM.
110. The method according to claim 107, wherein in step (a) the external device is in communication with a host banking system.
111. The method according to claim 107, wherein in step (a) the data representative of the first amount of value is received through a wireless network port of the portable personal ATM.
112. The method according to claim 103, further comprising:
- receiving cash corresponding to the second amount of value from the host ATM responsive to the at least one communication sent in step (c).

113. Computer readable media bearing instructions which are operative to cause at least one portable personal ATM to cause the portable personal ATM to carry out the method steps recited in claim 103.
114. A method comprising:
- (a) receiving with a host ATM including a cash dispenser at least one communication from a portable personal ATM, wherein the at least one communication is produced by the portable personal ATM responsive to at least one input to an input device on the portable personal ATM and includes data representative of an amount of value;
 - (b) dispensing cash corresponding to the amount of value with the host ATM responsive to the receipt of the at least one communication in step (a).
115. The method of claim 114, further comprising:
- debiting an account corresponding to the portable personal ATM for the amount of value through operation of the host ATM responsive to dispensing cash in step (b).

116. Computer readable media bearing instructions which are operative to cause at least one computer in a host ATM to cause the host ATM to carry out the method steps recited in claim 114.
117. A method comprising:
- (a) storing a plurality of account numbers in a data store of a portable personal ATM;
 - (b) receiving through at least one input device of the portable personal ATM, at least one input representative of a selected one of the plurality of account numbers and an amount of cash; and
 - (c) sending at least one communication from the portable personal ATM through a wireless connection port of a host ATM including a cash dispenser, wherein the at least one communication includes data representative of the selected one account number and the amount of cash.
118. The method according to claim 117, further comprising:
- (d) dispensing cash corresponding to the amount from the cash dispenser of the host ATM responsive to the at least one communication in step (c).

119. Computer readable media bearing instructions which are operative to cause at least one portable personal ATM to cause the portable personal ATM to carry out the method steps recited in claim 117.